

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>Case No: 3:22-cr-118</b>
	)	<b>JUDGE VARLAN</b>
<b>EDWARD KELLEY,</b>	)	<b>Magistrate Judge McCook</b>
	)	
<b>Defendant.</b>	)	

---

**MOTION BY THE DEFENDANT EDWARD KELLEY FOR LEAVE TO PLACE  
DOCUMENT UNDER SEAL**

---

COMES the Defendant Edward Kelley (“Kelley”), by and through counsel and moves this Court to place documents under seal for purposes of his sentencing hearing on July 2, 2025. For good cause Kelley shows that the document requested to be sealed is his confidential discharge record from the United States Marine Corps. Counsel for Kelley was required to go through a process from the military archives in St. Louis, Missouri just to obtain this record, and its disclosure to the public is not permitted.

This is the 18<sup>th</sup> day of June 2025.

/s/ Mark E. Brown

Mark E. Brown (BPR #021851)  
MENEFEE & BROWN, P.C.  
2633 Kingston Pike, Ste. 100  
Knoxville, Tennessee 37919  
Phone: (865) 357-9800  
Fax: (865) 357-9810

e-mail: [mbrown@menefeebrown.com](mailto:mbrown@menefeebrown.com)

*Attorney for the Defendant Edward Kelley*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of June 2025 a true and exact copy of this document has been served via this Court's electronic filing system with service on all parties appearing on this Court's electronic service certificate. All parties in interest may access this pleading via ECF.

/s/ Mark E. Brown

Mark E. Brown